

Application Before the
Federal Communications Commission
Washington, D.C. 20554

In the Matter of)
)
Albatross Telecom Limited)
Application Under Section 214)
Of the Communication Act of 1934,)
)
As Amended, for Global Authority)
)
For the Provision of Resold)
and Facilities-Based)
)
International Switched and)
Private Line Services)
)
Between the U.S. and Various)
International Points)

Preamble to formal Application

Albatross Telecom Limited is a company incorporated in the British Virgin Islands, for the global telecoms wholesale business.

Albatross is 100% owned by Ms Anita Francorsi and is managed out of Singapore, and will have places of operations in the US, UK, Philippines, Malaysia, India, and Indonesia to name but a few. The business of the company will expand in 2 distinct phases. In phase 1, the company will work with US and European aggregators to carry voice traffic INTO Asia Pacific countries; and thereafter once the company's reputation for volume and quality of service has been established to carry traffic back to the US and Europe. As such the company hereby formally seeks authorization from the FCC under Section 214 to carry on such business in the US.

The company has no affiliations with any carrier, dominant or otherwise in any country.

Albatross will offer lower rates than its competitors through the effective management of overheads and by dynamic destination management of services. Many wholesale operators suffer from having profitable routes subsidizing the less profitable. Albatross has a management technique developed to ensure that non-profitable routes are minimized and returns on profitable routes maximized. The net result is an ability to offer low cost routes to the aggregators as compared with our competitors.

APPLICATION

Albatross Telecom Limited ("ALBATROSS" or "Applicant"), by its attorneys and pursuant to Section 214 of the Communications Act of 1934, as amended ("the Act"), 47 U.S.C. 214, hereby requests global authority to (1) operate as a facilities-based carrier pursuant to the terms and conditions of Section 63.18 (e)(1) of the Commission's Rules, 47 C.F.R. 63.18 (e)(1), to all foreign points as authorized by the Commission and (2) operates as a resale carrier pursuant to the terms and conditions of Section 63.18 (e)(2) of the Commission's Rules to all foreign points as authorized by the Commission. 47 C.F.R. 63.18 (e)(2). ALBATROSS has no affiliation with any foreign carrier in any of the destination countries for which authority is requested nor is ALBATROSS affiliated with any dominant U.S. carrier whose services ALBATROSS may resell. Thus, pursuant to Section 63.10 (a)(1) of the Commission's Rules, 47 C.F.R. 63.10 (a)(1), ALBATROSS should be classified as a non-dominant carrier in its provision of international service on all routes.

Furthermore, as explained herein, this Application is entitled to streamlined processing under Section 63.12 of the Commission's Rules. 47 C.F.R. 63.12. According to the FCC's fee schedule, Fee Code CUT, an internet payment by credit card has been made along with Form 159 in the amount of US\$860 (United States Dollars Eight Hundred and Sixty) is attached hereto.

In support of its request for authority, ALBATROSS submits the following information pursuant to Section 63.18 of the Commission's Rules, 47 C.F.R. 63.18.

(a) The name and address of the Applicant is:

Albatross Telecom Limited
Trident Chambers
Wickhams Cay
P O Box 146
Road Town, Tortola
British Virgin Islands

(b) ALBATROSS is a corporation organized under the laws of the British Virgin Islands.

(c) Correspondence sent by post concerning this Application should be addressed to:

Mr. Peter Sim
Messrs. Sim Hill Tan and Wong
105 Cecil Street
#08-01 The Octagon
Singapore 069534
Tel: +65 6222 0891

with copies to:

Mr. Reeza Zarook
Albatross Telecom Limited
11 Stamford Road
#02-05 Capitol Building
Singapore 178884
Tel: +65 6338 1198
E-mail: reeza@ithrane.com

(d) ALBATROSS has not previously received Section 214 authority from the Commission.

(e) ALBATROSS is applying for authority to operate as a facilities-based carrier pursuant to the terms and conditions of Section 63.18 (e)(1), of the Commission's Rules. 47 C.F.R. 63.18 (e)(1) and as a resale carrier pursuant to the terms and conditions of Section 63.18 (e)(2) of the Commission's Rules. 47 C.F.R. 63.18 (e)(2). ALBATROSS requests authority to serve all countries permitted under a grant of global authority. As evidenced by the certification provided in Attachment A, ALBATROSS will comply with the terms and conditions contained in Section 63.21, 63.22 and 63.23 of the Commission's Rules. 47 C.F.R. 63.21-.23.

(f) At this time, Applicant does not seek authority to provide service not referenced under paragraph (e) of Section 63.18 of the Commission's Rules. 47 C.F.R. 63.18 (e).

(g) ALBATROSS is not seeking authorization under Section 63.18 (e)(3) and consequently ALBATROSS is categorically excluded from environmental assessment pursuant to Section 1.1306 of the Commission's Rules. 47 C.F.R. 1.1306.

- (h) ALBATROSS is owned by 100% by Ms Anita Francorsi, of 11 Stamford Road, #02-05 Capitol Building, Singapore 178884. Ms Francorsi is an Indian citizen. The principal place of business of ALBATROSS is Singapore, from where the global operations are managed.
- (i) As evidenced by the certification attached hereto as Attachment A, ALBATROSS is not affiliated with a foreign carrier.
- (j) As evidenced by the certification attached hereto as Attachment A, ALBATROSS does not seek to provide international telecommunications service to any destination where:
(1) ALBATROSS is a foreign carrier in that country; (2) ALBATROSS controls a foreign carrier in that country; (3) any entity that owns more than a 25% interest in ALBATROSS, or controls ALBATROSS, controls a foreign carrier in that country; or (4) two or more parties own, in the aggregate, more than 25% of ALBATROSS and are parties to, or the beneficiaries of, a contractual relationship that affects the provision or marketing of international basic telecommunications services in the United States.
- (k) Not applicable; ALBATROSS is not affiliated or otherwise related to any foreign carrier on any of the routes which ALBATROSS proposed to provide service in this Application.
- (l) Not applicable; ALBATROSS is not affiliated with a foreign carrier on any of the routes it proposes to resell international telecommunications service.
- (m) ALBATROSS is a start-up company and does not have dominant status in any country nor to any destination on any route, it is also not affiliated with any foreign carrier on any of the routes it proposes to provide services that has such dominance.
- (n) As evidenced by the certification provided in Attachment A, ALBATROSS has not agreed to accept special concessions directly or indirectly from any foreign carrier with respect to any U.S. international route the foreign carrier possesses sufficient market power on the foreign end of the route to affect competition adversely in the U.S. market and will not enter into such agreements in the future.
- (o) As evidenced by the certification provided in Attachment A, no party to this application is subject to a denial of Federal benefits pursuant to Section 5301 of the Anti-Drug Abuse Act of 1988.
- (p) ALBATROSS respectfully requests streamlined processing of this Application pursuant to Section 63.12 of the Commission's Rules, 47 C.F.R. 63.12. This Application qualifies for streamlined processing for the following reasons:
 - (1) ALBATROSS is not affiliated with a foreign carrier on any route for which authority is sought;
 - (2) ALBATROSS is not affiliated with any dominant U.S. carrier whose international switched or private lines services it seeks to resell; and
 - (3) ALBATROSS is not requesting authority to provide switched service over private lines to countries not previously authorized for service by the Commission.

Wherefore, ALBATROSS respectfully requests that the Commission grant it authority to provide international telecommunications services on a facilities and resale basis pursuant to Section 214 of the Communications Act of 1934, as amended.

Respectfully submitted,

Albatross Telecom Limited

By: _____

YC Ma, Director
Albatross Telecom Limited
11 Stamford Road
#02-05 Capitol Building
Singapore 178884
Tel: +65 6338 1198

Date: _____

Attachment A

The undersigned hereby certifies, on behalf of ALBATROSS TELECOM LIMITED ("ALBATROSS") with respect to the foregoing application for authority to provide international services, that:

1. ALBATROSS is not affiliated with any foreign carrier in any of the countries to which ALBATROSS proposes to provide service in the foregoing application.
2. ALBATROSS will comply with the terms and conditions contained in Section 63.21, 63.22 and 63.23 of the Commission's Rules. 47 C.F.R. 63.21-.23
3. ALBATROSS does not seek to provide international telecommunications service to any destination where:
 - 3.1. ALBATROSS is a foreign carrier in that country; or
 - 3.2. ALBATROSS controls a foreign carrier in that country; or
 - 3.3. any entity that owns more than a 25% interest in ALBATROSS, or controls ALBATROSS, controls a foreign carrier in that country; or
 - 3.4. two or more parties own, in the aggregate, more than 25% of ALBATROSS and are parties to, or the beneficiaries of, a contractual relationship that affects that provision or marketing of international basic telecommunications services in the United States.
4. ALBATROSS has not agreed to accept special concessions directly or indirectly from any foreign carrier with respect to any U.S. international route where the foreign carrier possesses sufficient market power on the foreign end of the route to affect competition adversely in the U.S. market and will not enter into such agreements in the future.
5. No party to this application is subject to a denial for Federal benefits pursuant to Section 5301 of the Anti-Drug Abuse Act of 1988, 21 U.S.C. 853 (a).

By: YC Ma

Title: Director

Date: 24th February 2003